

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

GTCR BC HOLDINGS, LLC, and

SURMODICS, INC.,

Defendants.

Case No. 1:25-cv-02391

Hon. Jeffrey I. Cummings

**JOINT MOTION FOR ENTRY OF [PROPOSED] JOINT STIPULATED CASE
MANAGEMENT ORDER AND RESOLUTION OF AREAS OF IMPASSE**

Pursuant to Federal Rule of Civil Procedure 26(f), Plaintiff Federal Trade Commission (“FTC” or “Commission”) has met and conferred with Defendants GTCR BC Holdings, LLC (“BC Holdings”) and Surmodics, Inc. (collectively, “Defendants”) in regards to a Case Management Order. The parties have agreed on most elements of a [Proposed] Joint Stipulated Case Management Order, attached below, but disputes remain as to three issues. With regard to those issues, the parties have embedded the disputed language in the body of the [Proposed] Joint Case Management Order in **bold** text and included short statements with each side’s positions following the disputed language. The parties respectfully request that the Court resolve those three areas of impasse and enter the attached [Proposed] Joint Stipulated Case Management Order. The parties are prepared to answer any questions the Court may have at the telephonic status hearing scheduled for April 17, 2025.

Dated: April 15, 2025

Respectfully submitted,

/s/ Maia Perez

Maia Perez

Jordan S. Andrew

James Weiss

Federal Trade Commission

Bureau of Competition

600 Pennsylvania Avenue, NW

Washington, DC 20580

Tel.: 202-322-8971

Email: mperez@ftc.gov

*Counsel for Plaintiff Federal Trade
Commission*

Le'Ora Tyree

Federal Trade Commission

Bureau of Competition

Midwest Regional Office

230 S. Dearborn St., Room 3030

Chicago, IL 60604

*Local Counsel for Plaintiff
Federal Trade Commission*

/s/ Daniel P. Culley

Daniel P. Culley

CLEARY GOTTLIEB STEEN &
HAMILTON LLP

2112 Pennsylvania Avenue, NW

Washington, DC 20037

Tel.: (202) 974-1593

Email: dculley@cghs.com

*Attorneys for Defendant GTCR BC
Holdings, LLC*

/s/ Paul Saint-Antoine

Paul Saint-Antoine

FAEGRE DRINKER BIDDLE & REATH
LLP

One Logan Square, Suite 2000

Philadelphia, PA 19103

Tel.: (215) 988-2990

Email: paul.saint-antoine

@faegredrinker.com

Attorneys for Defendant Surmodics, Inc